

US PRIVACY STATEMENT

Effective Date: July 1, 2016

Mercer believes strongly in protecting your privacy. This Privacy Statement applies to our websites, mobile applications, and other online and mobile applications associated with us and our services that link to or post this Privacy Statement (collectively, the “site”). This Privacy Statement is intended to inform you of the ways in which this site collects personal information, the uses to which that information is put, how and why we share that information and the ways in which we protect it. Generally, personal information is information that can identify you or your activities on the site or through services offered on the site.

This Privacy Statement applies solely to data collected via the site; you may provide Mercer with or Mercer may receive information about you other than in connection with this site; the collection and receipt of such information may be subject to its own terms. We encourage you to review the privacy policies and terms and condition that may apply to those practices. This privacy statement is not intended to alter the terms or conditions of any other agreements you may have with Mercer to the extent that those agreements govern issues other than your use of this site.

This Privacy Statement is incorporated into and subject to the [Terms of Use](#). By using this site, you acknowledge that you have read, understand and accept these Terms of Use, including this Privacy Statement. If you use this site as an employee or member of an organization, this site is also operated pursuant to any agreements we may have with your employer or benefit program sponsor. We encourage you to contact your employer or association for more information.

Please take a moment to familiarize yourself with our privacy practices. Let us know if you have any questions by using the “Contact Us” feature. You may also contact the following for assistance with any question you may have at PrivacyCoordinator@mercer.com.

Since we may change this Privacy Statement, we recommend that you check the current version available from time to time. If we make changes to this Privacy Statement, we will update the “Effective Date” at the top of the page. If there are significant changes, you will be provided with appropriate online notice. Your continued use of the site constitutes your agreement to the effective Privacy Statement.

WHAT INFORMATION DOES THIS PRIVACY STATEMENT COVER?

This Statement describes how we may collect, use, share, and keep information about you that we get about you. We gather information if you:

- Visit or use our website or apps;
- Receive or reply to electronic communications from us
- View or click on our ads or other online content
- Interact with us through social media websites and other websites and apps

In this statement, we also explain how we may combine online information with other information and how we then use the combined information.

WHAT DATA DO WE COLLECT?

Generally, we may collect the following information about you and, if required for the services provided, about your dependents or beneficiaries:

- contact information such as your name, address, email address, and phone number;
- demographic information such as your date of birth, marital status, and gender;
- financial information such as your Social Security number, financial account numbers, credit/debit card numbers, benefits information, and salary;
- information about the use of our site, such as records of, or relating to, your Internet Protocol address, your general geographic location, your browser type, your operating system, the pages you view on the site, the pages you view immediately before and after you access the site, and the search terms you enter on the site;
- health information such as a health insurance claim number, information submitted on a health insurance enrollment application, or information relating to health or mental condition or care thereof, insurance claims, or payment for health care; and
- decisions you may make with respect to the benefits administered.

Information provided by you, your representatives or third parties

We collect information from you; your representative; your employer or benefit program sponsor; and third parties that have roles in delivering services to you, your employer or benefit program sponsor. These include insurance companies, plan administrators and vendors, brokers or agents, credit agencies, and financial institutions. You might provide this information when you visit this site; apply for insurance coverage; enroll in a benefits program; communicate with us, including, but not limited to through email, chat, and instant messenger; when you speak to a representative in our call center; or when you send mail/faxes to our office. In addition, your employer or benefit program sponsor or someone acting on their behalf may provide us with information about you.

If you supply us with personal information about other people, you represent that you have the authority to provide this information on their behalf. In these instances, you further represent that the individuals to whom this information relates have been informed of and understand the reason(s) for obtaining the information, the manner in which this information will be used and disclosed, and have consented to such use and disclosure.

Information collected by automated means

We also collect or receive information over time and across different websites or platforms when you use the site. We may collect some of this information using cookies, web beacons and other technologies. Cookies are small pieces of text a website places on your computer to help remember information about your visit. Web beacons are tiny graphics with unique identifiers that are embedded invisibly on the web pages. Neither cookies nor web beacons can read data off your computer's hard drive. We use information collected from cookies and web beacons to improve your experience and the overall quality of our site. We also may use cookies and web beacons to collect information from third parties (such as Google) to help advertise our products and services, analyze the effectiveness of our marketing or the performance of this site, and determine whether you may be interested in other products or services. We also use web beacons to help deliver cookies and compile analytics. Our cookies and web beacons may come from third-party service providers who have our permission to place such tools on our site. Certain cookies collect Personal

Information, for example, if you click *Remember Me* when you log in to our website, a cookie will store your username.

We (and our service providers or third party ad servers) may collect information using cookies and web beacons about:

- The device used to browse sites
- The IP address and info related to that IP
- Browsing history on our sites
- How you search for our sites
- Which ads for us or our business partners you view, access, or click
- Browsing activities over time and across other sites
- Whether you open our electronic communications and how you interact with these communications
- Location of your mobile device

You can refuse to accept cookies and delete them by adjusting your browser settings. Please note that refusing or deleting cookies may impair your browsing experience on the site, or prevent you from using some of its services, and it may also delete any preferences you have set. For more information about how to reject or delete cookies, consult with your browser's or device's help documentation, or visit <http://www.aboutcookies.org> . We do not use technology that recognizes do-not-track signals from your browser. You can take steps to opt out of Internet-based advertising by installing a browser plugin from a third party, where available. For more information about Internet-based advertising, please see: http://www.networkadvertising.org/managing/opt_out.asp.

Information that is Publicly Available

We may also collect information made publicly available through third party platforms (such as online social media platforms), through online databases or directories, or that is otherwise publicly available or lawfully obtained. This information may be governed by the privacy policies provided by the third party at the time of collection. We encourage you to review the privacy policies of each third party website or online service you visit.

Information to Provide and Protect Our Site

In addition, in the course of ensuring network security and consistent service for all users, software programs may be employed to monitor network traffic, identify unauthorized access or access to nonpublic information, detect computer viruses and other software that might damage our computers or the network, and monitor and fine-tune our network's performance. These programs may detect additional information from your computer such as your IP address, addresses from network packets, and other technical information. Such information is used only to maintain the security and performance of our networks and computer systems.

We may combine the information you provide us and information we automatically collected with information from public or third-party sources.

HOW DO WE USE THE DATA WE COLLECT?

We use your personal information to:

- verify your identity;

- provide you with products and services you request, including processing a transaction, enrollment, or other service requested by you, directly or through a third party;
- allow you to manage your benefits program;
- contact you when necessary and respond to your requests and inquiries;
- customize your experience when using the site;
- market products and services to you, including ours, those of our affiliates, and those of other third parties;
- process payments directly or through third-party payment processing, clearing, or settlement systems;
- fulfill legal and regulatory requirements;
- update information with credit bureaus;
- detect and prevent fraud, suspicious claims, and other illegal activities;
- generate and analyze statistics about your use of the site; and
- analyze and improve products and services, enhance this site, and evaluate the effectiveness of our marketing activities and overall services.

We may also use your data in aggregated and de-identified ways to help us analyze patterns. We may share aggregated data in several ways, including with business partners to conduct analysis and research about customers and website visitors.

We work with our business partners to collect information about the use of the site. Our business partners collect information such as how often users visit the site and what pages users visited prior to visiting the site. We use this information to maintain and improve the site. We may partner with Google Analytics in these activities. For information about how Google uses the information, see Terms of Service and the Google Privacy Policy. You can opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout>.

WITH WHOM DO WE SHARE YOUR DATA?

We share your information to assist with managing and running this site, administer your benefits, or provide other products or services as requested by you, your employer, or benefit program sponsor or otherwise as described in this Privacy Statement or when we have your consent. We may share this information with:

- your employer or benefit program sponsor;
- our affiliates, subsidiaries and business partners to enable them to provide services to you and to contact you regarding additional products and services that may be of interest to you;
- third-party service providers that have been retained to perform services on our behalf or on behalf of your employer or other benefit program sponsor, or as authorized by your employer or other benefit program sponsor; and
- third party service providers retained by Mercer to provide services directly to you through this program.

We may also share information in association with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.

Third parties to whom we disclose information are required by law and/or contractual requirements to keep your personal information confidential and secure. These parties may not use or disclose it except as

reasonably necessary to provide services on our behalf, on behalf of your employer or other benefit program sponsor, or to comply with or as permitted by applicable law.

We do not rent, sell, or otherwise disclose your information to unaffiliated third parties for their own marketing, unless so authorized by your employer or benefit program sponsor.

We may disclose your personal information without your prior permission, as permitted by law, including instances when we have a good faith belief it is necessary to: (a) protect the legal rights, safety and security of Mercer, our affiliates and business partners, and users of our site; (b) enforce the Terms of Use; (c) respond to claims of suspected or actual illegal activity; (d) respond to an audit or investigate a complaint or security threat; or (e) comply with law or legal process, or request for cooperation by a government or other entity.

We may share information that is not reasonably identified with you for any purpose.

FOR HOW LONG DO WE RETAIN YOUR INFORMATION?

We may retain information that can reasonably identify you for as long as your account is active or as we determine is needed for our reasonable business purposes, including to comply with our legal obligations, resolve disputes, and enforce our agreements.

WHAT STEPS DO WE TAKE TO PROTECT YOUR INFORMATION?

This site and all information submitted by or on behalf of you through this site may be collected, stored, and processed in countries other than the one in which you reside, including, but not limited to, the United States.

We restrict access to your personal information to those employees of ours, our affiliates, and third-party service providers who reasonably need it to provide products or services. We have implemented physical, administrative, and technical safeguards to protect your personal information from unauthorized access. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of these systems, nor can we guarantee that information supplied by you or on your behalf cannot be intercepted while being transmitted over the Internet.

WHAT RIGHTS AND OBLIGATIONS DO YOU HAVE WITH RESPECT TO YOUR DATA?

Accessing and correcting your information

Keeping your information accurate and up-to-date is very important. Inaccurate or incomplete information could impair our ability to deliver relevant services to you. Please let us know about any necessary changes to your personal information. Use the "Contact Us" feature of this site.

Securing your own information

By using this site, you represent that you will likewise take measures to protect this information, including the maintenance of any username and password in a confidential manner, and restricting system access to those who may need such access on your behalf.

SOME OTHER MATTERS

External links

This site includes links to other websites that are operated by other organizations. If you access another organization's site using a link provided, that organization may collect information from you. We are not

responsible for the content or privacy practices of linked websites or their use. Once you have left this site via such a link (you can tell where you are by checking the URL in the location bar on your browser), you should refer to those websites' privacy policies, terms of use, and practices to determine how they handle any information they collect from you.

Does this Privacy Statement apply to international users?

This Privacy Statement is provided in accordance with and subject to U.S. law. If you access this site from a location outside the United States, you agree that your use of this site is subject to the terms of this Privacy Statement and the Terms of Use.

Business transactions

In the event we sell some or all of our assets or go through other business transactions, such as mergers, acquisitions, bankruptcy or reorganizations it is possible your personal information could be one of the assets sold or transferred in connection with the transaction. We may disclose and/or transfer your personal information to a third-party purchaser in these circumstances.

Children

This site is not intended for children, and we do not knowingly collect, use, or disclose information of children under the age of thirteen (13) without the consent of their parents or legal guardians. In an instance where such information was collected, it would be purely accidental and unintentional.

Rights of California residents

Under California's "Shine the Light" law, site visitors who are California residents may request and obtain a notice once a year about the personal information we share with other businesses for their direct marketing purposes. Such a notice includes a list of the categories of personal information that was shared (if any), and the names and addresses of all third parties with which the personal information was shared (if any). The notice covers the preceding calendar year. To obtain such a notice, please contact us as previously described. In addition, under this law you are entitled to be advised how our site handles "do not track" browser signals. As described previously, we do not use technology recognizing do-not-track signals from your browser.

Questions or concerns

If you have any questions, concerns, or complaints about this Privacy Statement, or our privacy practices in general, please contact us using the "Contact Us" feature of this site.